<u>Purpose</u>: To document new or revised compliance items to be tested and/or document testing.

Source: Workpapers as referenced.

Scope: Compliance items tested each year are based on risk assessment.

<u>Conclusion</u>: Compliance selections and/or testing is documented per Compliance Guide and workpapers.

	FY14	FY15
Incharge		
Manager		
Independent Reviewer		

In addition to the updated City Compliance Guide, we have made available this 2014 City Compliance Guide Supplement which details all changes made to the prior year City Compliance Guide. This Supplement may be used to update the prior year Compliance Guide in lieu of completing a new guide each year.

	Cate- gory	mpl oted/FY	FY14				FY15						
	Cate- gory	Non-cor iance N	Sele- cted	Done By	WP Ref	Remarks	Sele- cted		WP Ref	Remarks			
LONG-TERM DEBT:													
1. <b>(14)</b> General obligation, special assessment and revenue bonds and notes:													
<ul> <li>h. (14) Determine the City has complied with the reporting requirements of SEC Rule 15c2-12. Effective July 1, 2009, issuers are subject to ongoing filing requirements for issuances of more than \$1,000,000. All continuing disclosure submissions must be provided to the Municipal Securities Rulemaking Board (MSRB) through its Electronic Municipal Market Access (EMMA) system (www.emma.msrb.org).</li> <li>i. (14) Determine if the City has established written procedures to monitor compliance with the arbitrage, yield restrictions and rebate requirements under Section 148 of</li> </ul>	2												
the Federal Internal Revenue Service rules.													

	Cate- gory	mpl oted/FY			FY14			FY15	
	Cate- gory	Non-cor iance N	Sele- cted	Done By	WP Ref	Remarks	Sele- cted	WP Ref	Remarks
TAX INCREMENT FINANCING:									
<ul> <li>3. (14) Obtain a copy of the Urban Renewal Area TIF Indebtedness/Increment Tax Reconciliation prepared by the County Auditor.</li> <li>a. Review the Reconciliation to identify and document the City's certified TIF obligations.</li> <li>b. Scan the Reconciliation for unusual or unallowable obligations (i.e. debt certified more than once, projected costs, etc.).</li> </ul>	1								
<ul> <li>4. (14) Determine the following regarding the Tax Increment Debt Certificate due December 1 of the fiscal year under audit:</li> <li>a. (14) The amounts certified on Form 1 and Form 1.1, or equivalent documents, for TIF debt not previously certified are supported and represent loans, advances or other qualified indebtedness or bonds which qualify for payment from the TIF revenues for each urban renewal area in the City as required by Chapter 403.19(6)(a) of the Code of Iowa and the Certificate was filed by December 1. For annual appropriated debt, the amount certified should be limited to the amount appropriated to be paid in the next fiscal year.</li> <li>NOTE: In general, qualified TIF indebtedness must (1) be for a program in the urban renewal area, (2) be for an activity covered by the allowable list in Chapters 403.6(6) and 403.12(1) of the Code of Iowa, (3) be for a project covered by the plan and (4) further the goals of the plan.</li> </ul>	1								

		Cate- gory	mpl Voted/FY	FY14					FY15			
		Cate- gory	Non-co iance l		Sele- cted	Done By	WP Ref	Remarks	Sele- cted		WP Ref	Remarks
TAX INC	CREMENT FINANCING (continued):											
:	(14) For reinvestment districts established in economic development enterprise zones or urban renewal areas, obtain a copy of the report due October 1 and determine if the report includes the following pursuant to Chapter 15J.4(6) of the Code of Iowa:											
	a. The status of each project undertaken in the district in the previous 12 months.	2										
	b. An itemized list of expenditures from the reinvestment project fund for projects undertaken in the district in the previous 12 months.	2										
	c. The amount of total project cost remaining for each project undertaken within the district as of the date of the report	2										
	d. The amounts, types and sources of funding used for each project.	2										
	e. The amount of any indebtedness incurred for each project including information related to the rate of interest, term, issuance cost, net proceeds and types of funds to be used for payment.	2										
:	(14) For reinvestment districts, determine if the project funds on hand, including interest, exceed the amount necessary to support completion of the project and any excess was remitted to the Iowa Department of Revenue pursuant to Chapter 15J.7(1) of the Code of Iowa.	2										

		Cate- gory	mpl foted/FY			FY14				FY15	
		Cate- gory	Non-co iance N	Sele- cted	Done By	WP Ref	Remarks	Sele- cted	Done By	WP Ref	Remarks
RECEI	PTS/REVENUES:										
5.	(14) Determine whether any sales tax revenue received pursuant to Chapter 418.13 of the Code of Iowa was deposited in the City's flood project fund.	3									
6.	(14) Determine I-Jobs funds received were expended in accordance with the applicable agreement(s) and the City complied with any applicable reporting requirements.	2									
7.	(14) Reinvestment Project Fund – Determine sales and hotel/motel taxes received from the Iowa Department of Revenue were deposited into a separate fund for reinvestment proejcts pursuant to Chapter 15J.7 of the Code of Iowa.	2									
8.	(14) Joint County-City Building:										
	a. Determine any tax levy imposed under Chapter 346.27(22) of the Code of Iowa was deposited into a separate account in the City's Debt Service Fund.	2									
	b. Determine any funds expended are for the payment of the annual rent and disbursed pursuant to Chapter 346.27(22) of the Code of Iowa.	2									

		mpl loted/FY			FY14		FY15					
	Cate- gory	Non-co iance N	Sele- cted	Done By	WP Ref	Remarks	Sele- cted	Done By	WP Ref	Remarks		
DISBURSEMENTS/EXPENDTIURES:												
4. <b>(14)</b> For capital projects and other construction contracts (for bid/quote thresholds applicable prior to 1-1-14 refer to the 2013 Compliance Guide):												
f. (14) Determine construction contracts do not contain clauses which would make the in-state construction contracts subject to the laws of another state or which require litigation, mediation, arbitration or other dispute resolution proceedings be conducted in another state in accordance with Chapter 537A.6 of the Code of Iowa.	3											
8. <b>(14)</b> Reinvestment Project Fund – Determine funds were disbursed in accordance with the proposed project plans and Chapter 15J.7 of the Code of Iowa.	2											
9. <b>(14)</b> Joint County-City Building – Determine funds were disbursed for the payment of annual rent and were in accordance with Chapter 346.27(22) of the Code of Iowa.	2											